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*Attorneys for Debtors and Reorganized Debtors*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ANGELA FERRANTE  
IN SUPPORT OF REORGANIZED DEBTORS'  
TWENTY-FIFTH SECURITIES CLAIMS  
OMNIBUS OBJECTION (NOTEHOLDER  
SECURITIES CLAIMS)**

**Response Deadline:**

**September 19, 2023, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: October 3, 2023

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Angela Ferrante, hereby declare that the following is true and correct to the best of my  
2 knowledge, information, and belief:

3 1. I am a Managing Director of Kroll Settlement Administration LLC, an affiliate of Kroll  
4 Restructuring Administration LLC (formerly known as Prime Clerk) (collectively for purposes of this  
5 Declaration, “**Kroll**”). In my current role as Managing Director, I am responsible for all business  
6 operations including but not limited to securities claims noticing and administration.

7 2. I am providing this Declaration in support of the *Reorganized Debtors’ Twenty-Fifth*  
8 *Securities Claims Omnibus Objection (Noteholder Securities Claims)* (the “**Omnibus Objection**”),<sup>1</sup>  
9 filed contemporaneously herewith in the chapter 11 cases (the “**Chapter 11 Cases**”) of PG&E  
10 Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the  
11 “**Debtors**” or the “**Reorganized Debtors**,” as applicable).

12 3. Kroll has been asked by the Reorganized Debtors and their counsel to assist with  
13 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the  
14 Chapter 11 cases. I have over 20 years of experience in class action, legal, and administrative fields. I  
15 have personally overseen the administration of some of the most complex class action, regulatory and  
16 bankruptcy administrations in the country.

17 4. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon  
18 my personal knowledge, the knowledge of other employees working under and alongside me on this  
19 matter, my discussions with the Reorganized Debtors’ personnel and the Reorganized Debtors’ various  
20 advisors and counsel, and my review of relevant documents and information. If called upon to testify, I  
21 would testify competently to the facts set forth in this Declaration. I am authorized to submit this  
22 Declaration on behalf of the Reorganized Debtors.

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26 <sup>1</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the  
27 Omnibus Objection.  
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1           **Identification of Claims Subject to the Omnibus Objection**

2           5.       Kroll has been asked by the Reorganized Debtors and their counsel to assist with  
3 reviewing and analyzing the claims based on the purchase or acquisition of PG&E securities filed in the  
4 Chapter 11 Cases and identifying claims to be included in omnibus objections, including the Omnibus  
5 Objection. In furtherance thereof, our team has reviewed and established a database for these claims.  
6 The database contains information extracted from proofs of claim and submitted by claimants via an  
7 online portal, including, where such details were provided by the claimant, information regarding when  
8 such claimant purports to have acquired their position(s) in the Debtors' debt and equity securities that  
9 form the basis of the claim.

10          6.       Based on our review, and utilizing our proprietary software, we have identified certain  
11 securities claims—the “**Noteholder Securities Claims**”—derived from the purchase or acquisition of  
12 specific PG&E securities (“Utility Senior Notes”) during the period from April 29, 2015 through  
13 November 15, 2018, inclusive.

14          7.       These Noteholder Securities Claims are set forth on **Exhibit 1** to the Omnibus Objection,  
15 which was prepared by our team under my general supervision, and I am familiar with its contents and  
16 the process under which it was prepared.

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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct to the best of my knowledge, information, and belief.

3  
4 Executed August 17, 2023 in New York.

A handwritten signature in blue ink, consisting of a large, stylized 'A' followed by a long, horizontal, wavy line.

6  
7 Angela Ferrante  
Managing Director